

**Exhibit D**

**Budget and Staffing Plan**

**Exhibit D-1**

**Budget Plan for the Compensation Period**

Matter No.	Matter	October 2021		November 2021		December 2021		January 2022		February 2022		March 2022 (through 3/15/2022)	
		Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fee	Actual Fees	Estimated Fees
33260.0083	PROMESA TITLE III: PBA	\$ 13,352.80	\$ 15,000.00	\$ 4,139.50	\$ 5,000.00	\$ 950.30	\$ 5,000.00	\$ 1,616.40	\$ 5,000.00	\$2,122.70	\$ 5,000.00	\$212.10	\$ 2,500.00
<b>PBA TOTAL</b>		<b>\$ 13,352.80</b>	<b>\$ 15,000.00</b>	<b>\$ 4,139.50</b>	<b>\$ 5,000.00</b>	<b>\$ 950.30</b>	<b>\$ 5,000.00</b>	<b>\$ 1,616.40</b>	<b>\$ 5,000.00</b>	<b>\$ 2,122.70</b>	<b>\$ 5,000.00</b>	<b>\$ 212.10</b>	<b>\$ 2,500.00</b>
<b>ESTIMATED FEES Compensation Period (October 2021 - March 15, 2022)</b>												<b>\$37,500.00</b>	
<b>ACTUAL FEES Compensation Period (October 2021 -March 15, 2022) TO</b>												<b>\$22,393.80</b>	
<b>Percent Variance (Actual vs. Budgeted F</b>												<b>40.3% below budget</b>	

**Exhibit D-2**

**Staffing Plan for the Compensation Period**

**Staffing Plan for the Compensation Period<sup>1</sup>**

<b>Category of Timekeeper<sup>2</sup></b>	<b>Number of Timekeepers Expected to Work on The Matter During the Budget Period</b>	<b>Average Hourly Rate<sup>3</sup></b>
Partners	8	\$853/ \$887
Senior Counsel	5	\$853/ \$887
Associates	8	\$853/ \$887
e-Discovery Attorneys	5	\$421/ \$438
Paraprofessionals	6	\$291/\$303
<b>Total:</b>	<b>32</b>	

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<sup>1</sup> The actual number of timekeepers who worked on this matter during the Compensation Period was 13, and thus 19 fewer than anticipated.

<sup>2</sup> Attorney Practice Groups: BSGR&B, Tax, and Litigation.

<sup>3</sup> Pursuant to the Engagement Letter, Proskauer's rates increased 4% effective January 1, 2022, yielding a new flat rate for attorneys (partners, senior counsel, and associates) of \$887 per hour, for e-discovery attorneys of \$438 per hour, and for paraprofessionals of \$303 per hour.